

1 ROGER P. CROTEAU, ESQ.
2 Nevada Bar No. 4958
3 TIMOTHY E. RHODA, ESQ.
4 Nevada Bar No. 7878
5 ROGER P. CROTEAU & ASSOCIATES, LTD.
6 9120 West Post Road, Suite 100
7 Las Vegas, Nevada 89148
(702) 254-7775
(702) 228-7719 (facsimile)
croteaulaw@croteaulaw.com
8 *Attorney for Defendants*
9 **LAS VEGAS DEVELOPMENT**
10 **GROUP, LLC; LVDG, LLC; AND**
11 **LAS VEGAS DEVELOPMENT, LLC**

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 FEDERAL HOUSING FINANCE AGENCY,)
2 in its capacity as Conservator of Federal)
3 National Mortgage Association and Federal)
4 Home Loan Mortgage Corporation; FEDERAL) Case No. 2:16-cv-01187-GMN-CWH
5 NATIONAL MORTGAGE ASSOCIATION;)
6 and FEDERAL HOME LOAN MORTGAGE)
7 CORPORATION,)
8 Plaintiffs,)
9 vs.)
10 LAS VEGAS DEVELOPMENT GROUP, LLC;)
11 LAS VEGAS DEVELOPMENT, LLC; and)
12 LVDG, LLC,)
13 Defendants.)
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UNOPPOSED MOTION TO EXTEND TIME TO
RESPOND TO MOTION FOR SUMMARY JUDGMENT
(First Request)

23 COMES NOW, Defendants, LAS VEGAS DEVELOPMENT GROUP, LLC; LAS
24 VEGAS DEVELOPMENT, LLC; and LVDG, LLC, and hereby present their unopposed motion
25 to extend the time in which they may respond to the Plaintiff's pending Motion for Summary
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1 Judgment, stating as follows:

2 1. On June 10, 2019, Plaintiffs filed a Motion for Summary Judgment herein [ECF
3 #41]. A response to said Motion was due on July 1, 2019.

4 2. Defendants' counsel had expected to complete the Opposition to the Motion for
5 Summary Judgment prior to the due date. However, a number of other matters
6 came up that made doing so impossible, including numerous other pending legal
7 matters and family obligations associated with Independence Day holiday. In
8 addition, Defendants' counsel hopes to discuss settlement and potentially narrow
9 the issues at hand.

10 3. Late in the day on July 1, 2019, Defendants' counsel sent an email to Plaintiffs'
11 counsel requesting a 2 week extension of time until July 15, 2019, in which to
12 respond to the pending Motion, together with a proposed stipulation to extend
13 time. Kelly Dove, Esq., counsel for Federal National Mortgage Association,
14 responded relatively immediately with her client's consent to the proposed
15 stipulation.

16 4. John Tennert, Esq., counsel for Federal Housing Finance Agency, and John
17 Maddock, III, Esq., counsel for Federal Home Loan Mortgage Corporation,
18 responded to counsel's email on July 2, 2019, advising that while they do not
19 oppose the requested extension, they feel that they cannot now so stipulate since
20 the original deadline has passed. Both Mr. Tennert and Mr. Maddock advised that
21 they will not oppose the instant Motion.

22 5. Defendants' counsel respectfully submits that the failure to submit a stipulation or
23 motion in advance of the existing deadline constitutes excusable neglect under the
24 circumstances herein.

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6. This Motion is made in good faith and not for purpose of delay.

NOW THEREFORE, Defendant, Thunder Properties, Inc., respectfully requests that this Court extend the time in which it may respond to Plaintiffs' pending Motion for Summary Judgment [ECF #41] until July 15, 2019.

Dated this 2nd day of July 2019.

ROGER P. CROTEAU & ASSOCIATES, LTD.

/s/ Timothy E. Rhoda
ROGER P. CROTEAU, ESQ.

**ROGER T. CROTEAU, ESQ.
Nevada Bar No. 4958**

Nevada Bar No. 1998
TIMOTHY E. RHODA, ESO.

Nevada Bar No. 7878

9120 West Post Road, Suite 100

Las Vegas, Nevada 89148

(702) 254-7775

Attorney for Defendants

LAS VEGAS DEVELOP

GROUP, LLC; LVDG, LLC; AND LAS VEGAS DEVELOPMENT, LLC

IT IS SO ORDERED.

DATED this 3 day of July, 2019.

Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of July, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT (First Request)** to the following parties:

Tennille Checkovich
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
804-775-4758
804-440-7770 (fax)
tcheckovich@mcguirewoods.com
Attorney for Plaintiff
Federal Home Loan Mortgage Corporation

Robin E Perkins
Snell & Wilmer L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
702-784-5238
702-784-5252 (fax)
rperkins@swlaw.com
Attorney for Plaintiff
Federal National Mortgage Association

Kelly H Dove
Snell & Wilmer L.L.P.
3883 Howard Hughes Parkway
Las Vegas, NV 89169
(702) 784-5200
(702) 784-5252 (fax)
[kdove@swlaw.com](mailto:k dove@swlaw.com)
Attorney for Plaintiff
Federal National Mortgage Association

Amy F. Sorenson
Snell & Willmer, LLP
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
801-257-1907
801-257-1800 (fax)
asorenson@swlaw.com
Attorney for Plaintiff
Federal National Mortgage Association

Leslie Bryan Hart
Fennemore Craig, P.C.
300 E. Second St., Suite 1510
Reno, NV 89501-
775-788-2228
lhart@fclaw.com
Attorney for Plaintiff
Federal Housing Finance Agency

Michael W. Stark
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
804-775-1178
804-698-2416 (fax)
mstark@mcguirewoods.com
Attorney for Plaintiff
Federal Home Loan Mortgage Corporation

John H. Maddock, III
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
804-775-1178
804-698-2416 (fax)
jmaddock@mcguirewoods.com
Attorney for Plaintiff
Federal Home Loan Mortgage Corporation

/s/ Timothy E. Rhoda
An employee of ROGER P. CROTEAU &
ASSOCIATES, LTD.